

**SPARACINO**  
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February 23, 2022

**Via ECF**

The Honorable Kiyo A. Matsumoto, U.S.D.J.  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Wildman, et al. v. Deutsche Bank AG, et al.*, No. 1:21-cv-4400**

Dear Judge Matsumoto,

We represent the Plaintiffs in the above-captioned matter.

We write to request a pre-motion conference regarding Plaintiffs' motion to submit a modified version of the Amended Complaint. Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiffs plan to move Your Honor for leave to file a corrected version of Plaintiffs' Amended Complaint filed on February 15, 2022 (Dkt. No. 35), to address formatting errors, fix typos, and harmonize headers.

Plaintiffs' proposed Corrected Amended Complaint does not change the substance of the allegations as pleaded, *i.e.*, the text of the paragraphs inside the Amended Complaint as filed on February 15, 2022 other than to fix typos.

Accordingly, granting Plaintiffs leave to file the Corrected Amended Complaint does not create an improper tactical advantage for Plaintiffs, and does not prejudice Defendants. Plaintiffs have conferred with opposing counsel for Defendants who have appeared in this matter and Defendants do not oppose Plaintiffs' request for leave to file the corrected Amended Complaint.

Given Plaintiffs' desire to fix these scriveners' errors in a manner that does not materially alter any allegation or prejudice Defendants, Plaintiffs believe the requested relief is appropriate.

Attached to this filing as Exhibit 1 is a clean version of the proposed corrected Amended Complaint; attached as Exhibit A is Exhibit A to the Amended Complaint; attached as Exhibit 2 is a redline comparison tracking the changes between the Original Complaint (Dkt. No. 1) to the Amended Complaint filed on February 15, 2022 (Dkt. No. 35); and attached as Exhibit 3 is a redline comparison tracking the changes between the Amended Complaint filed on February 15, 2022 (Dkt. No. 35) to the corrected Amended Complaint we would file if given leave.

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Once Plaintiffs' request is resolved we will promptly deliver courtesy copies of the Corrected Amended Complaint to Chambers.

Sincerely,

/s/ Ryan R. Sparacino  
SPARACINO PLLC

cc: All counsel of record (via ECF)